

Missouri Department of Natural Resources
Air Pollution Control Program

PART 70

PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Operating Permit Number: OP2006-061

Expiration Date: AUG 29 2011

Installation ID: 143-0015

Project Number: 2005-01-097

Installation Name and Address

Siegel Robert Automotive - Portageville
101 Meatte Street
Portageville, MO 63873
New Madrid County

Parent Company's Name and Address

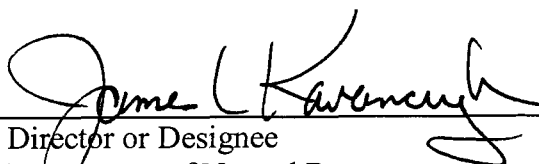
Siegel Robert Automotive
12837 Flushing Meadows
St. Louis, MO 63131-1830

Installation Description:

Siegel Roberts Automotive – Portageville (formerly Plastene Supply Company) is a manufacturer of molded plastic parts for the automotive and appliance industries. Manufacturing operations conducted at the installation includes high-pressure injection molding, liquid spray surface coating, copper, nickel and chrome plating. Drying and curing ovens, grinders, boilers and storage tanks are also operated at the installation. A water treatment operation is used to remove metals from the process wastewater.

AUG 30 2006

Effective Date



Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Siegel Roberts Automotive is a manufacturer of molded plastic parts for the automotive and appliance industries. Manufacturing operations conducted at the installation include high pressure injection molding, liquid spray surface coating, copper, nickel and chrome plating. Drying and curing ovens, grinders, boilers and storage tanks are also operated at the installation. A water treatment operation is used to remove metals from the process wastewater.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2004	0.19	0.02	4.76	30.72	1.01	0.00	Note 1
2003	0.22	0.02	5.33	42.23	0.43	0.00	
2002	0.46	0.03	7.34	124.76	0.62	0.00	
2001	0.93	0.04	8.21	240.06	1.96	0.00	
2000	1.00	0.04	9.17	291.98	0.88	0.00	

Note 1: Although the table includes no values for Hazardous Air Pollutants, the installation did emit Hazardous Air Pollutants during the years 2000-2004. The HAPs emissions were reported as VOCs on Form 2T pages of the Emission Inventory Questionnaires in the applicable years.

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and which is identified as having unit-specific emission limitations.

Emission Unit #	Description of Emission Unit
EU0010	Surface Coating Operations, (Existing prior to 1983)
EU0020	Surface Coating Operations, (In operation since 1998)
EU0030	Natural Gas Fired Boiler, (Installed in 1998)
EU0040	Chromium Electroplating Operation

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment which does not have unit specific limitations at the time of permit issuance.

Description of Emission Source

3.36 MMBtu/hr Boiler, installed 1969
Ten (10) Air Heater/Makeup units ranging between 0.150 to 0.400 MMBtu/hr heat input
Thirty (30) Space Heaters ranging between 0.150 to 0.400 MMBtu/hr heat input
Twenty (20) Drying Ovens ranging between 0.150 to 1.00 MMBtu/hr heat input
2,300 gallon formaldehyde storage tank
Two (2) 2,000 gallon hydraulic oil storage tanks
1,000 gallon hydraulic oil storage tank
4,500 gallon nitric acid storage tank
5,800 gallon nitric acid storage tank

10,000 gallon nitric acid storage tank
4,500 gallon hydrochloric acid storage tank
6,000 gallon hydrochloric acid storage tank
Two (2) 6,000 gallon sulfuric acid storage tanks
Two (2) 5,000 gallon acetone underground storage tanks
5,000 gallon methyl ethyl ketone underground storage tank
Plating solution holding tanks
Caustic storage tank
Mask washers
Rack welding
Wastewater treatment tank
Two (2) 20,000 gallon propane tanks
Four (4) raw material silos for holding plastic
3,500 gallon liquid nitrogen tank
Filter Press for wet cake from wastewater treatment
Rack Stripper (caustic/nitric acid)
Emergency diesel water pump for sprinkler system
992,000 BTU/hr boiler for sprinkler system
Two (2) 1,000 gallon diesel fuel storage tanks
Molding operations
Wastewater treatment operations
Plastics Grinding
Nickel Plating Operations
Copper Plating Operations

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Construction Permit #1298-009
- 2) Decorative Chromium Electroplating Emissions Operation and Maintenance Plan

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

Permit Condition PW001¹

10 CSR 10-6.065

Operating Permits

Voluntary Permit Condition, 10 CSR 10-6.065(6)(C)2.A

Emission Limitation:

- 1) The permittee shall emit less than 10 tons of any individual HAP per consecutive 12-month period; and
- 2) The permittee shall emit less than 25 tons of any combination of HAPs per consecutive 12-month period.

Monitoring/Recordkeeping:

The permittee shall maintain an accurate record of emissions of HAPs emitted into the atmosphere from this installation. Example forms are attached as Attachment A-1 and A-2. The permittee may use these forms, or forms of its own, so long as the forms used will accurately demonstrate compliance with the HAPs emission limitation (less than 10 tons per consecutive 12-month period of any individual HAP or less than 25 tons per consecutive 12-month period of any combination of HAPs).

Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this permit condition, or any malfunction which causes a deviation from or exceedance of this permit condition.

¹ This permit condition establishes an emissions cap on all HAP (s) sources at this installation. Limitations volunteered by the permittee to avoid being subject to 40 CFR Part 63, Subpart PPPP.

Permit Condition PW002

10 CSR 10-6.220

Restriction of Emission of Visible Air Contaminants

Emission Limitation:

- 1) No person may discharge into the ambient air from any single new source of emission whatsoever, any air contaminant of a shade or density equal to or darker than 20% opacity.
- 2) No person shall discharge into the atmosphere from any source of emission any air contaminant greater than 60% visible opacity for a period in excess of six (6) minutes in any consecutive sixty (60) minute period.

Monitoring:

The permittee shall conduct opacity readings on the emission unit(s) using the procedures contained in USEPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit(s) is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation..

- 1) The following monitoring schedule must be maintained:
 - a) Monthly observations shall be conducted for a minimum of eight consecutive months after permit issuance. Should no violation of this regulation be observed during this period then-
 - b) Observations must be made once every two (2) months for a period of eight months. If a violation is noted, monitoring reverts to monthly. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made semi-annually (i.e., once per reporting period). Observation shall be conducted during the January-June reporting period and during the July-December reporting period. If a violation is noted, monitoring reverts to monthly.
- 2) If the source reverts to monthly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (see Attachment B-1 and Attachment B-2), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
 - d) The permittee shall maintain records of any equipment malfunctions.
- 2) The permittee shall maintain records of any other Method 9 test performed in accordance with this permit condition. (See Attachment B-3)

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

EU0010 – Surface Coating Operations - 26 Booths			
Emission Unit	Description	Manufacturer/Model #	2004 EIQ Reference #
EU0010	26 Booths- Fabric Filters or Water Curtains Used Coating Mixing, Coating Application, Equipment Cleaning	In-house	EP03

Permit Condition EU0010-001

10 CSR 10-6.400

Restriction of Emissions of Particulate Matter from Industrial Processes

Emission Limitation:

- 1) The permittee shall not emit particulate matter in excess of 0.75 lbs/hr from these emission units combined.
- 2) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 grain per standard cubic foot (gr/scf).

Monitoring/Recordkeeping:

The permittee shall monitor the below control devices on all of the surface coating operations associated with emission unit:

- 1) *Fabric Filters:*
 - a) Booths equipped with fabric filters shall not be operated without a fabric filter in place.
 - b) Fabric filters shall be inspected for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
 - c) The filters shall be inspected each shift before spraying begins in a booth and after installation of a new filter.
 - d) The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters.
- 2) *Water Curtains*
 - a) Booths equipped with a water curtain shall not be operated without the water curtain flow being established.
 - b) The water curtain operation shall be inspected for uniform and adequate flow and for other problems that could hinder the effectiveness of the filter.
 - c) The water curtains shall be inspected each shift before spraying begins in a booth and after start-up of the water flow.
 - d) The flow of water to the booth shall be maintained according to the manufacturer's recommendations.

Recordkeeping:

The permittee shall maintain records of the inspections of fabric filters and/or water curtains and when they occur.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitation(s) listed above.

- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

EU0020 – Surface Coating Operations-4 Booths			
Emission Unit	Description	Manufacturer/Model #	2004 EIQ Reference #
EU0020	4 Booths- Fabric Filters Used Coating Mixing, Coating Application, Equipment Cleaning	In-house	EP03

Permit Condition EU0020-001

10 CSR 10-6.400

Restriction of Emissions of Particulate Matter from Industrial Processes

Emission Limitation:

- 1) The permittee shall not emit particulate matter in excess of 0.20 lbs/hr from these emission units combined.
- 2) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 grain per standard cubic foot (gr/scf).

Monitoring:

The permittee shall monitor the below control devices on all of the surface coating operations associated with emission unit:

- 1) Booths equipped with fabric filters shall not be operated without a fabric filter in place.
- 2) Fabric filters shall be inspected for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
- 3) The filters shall be inspected each shift before spraying begins in a booth and after installation of a new filter.
- 4) The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters.

Recordkeeping:

The permittee shall maintain records of the inspections of fabric filters when they occur.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitation(s) listed above.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

Permit Condition EU0020-002

10 CSR 10-6.060

Construction Permits Required

Construction Permit No. 1298-009

Emission Limitation:

The permittee shall not discharge into the atmosphere from the four (4) spray booths using HVLP spray guns VOCs in excess of forty (40) tons in any consecutive twelve (12)-month period.

Monitoring:

The permittee shall monitor the monthly amount and type of material containing VOCs in these emission units.

Recordkeeping:

- 1) The permittee shall maintain records of monthly and twelve (12)-month rolling VOC emissions on site for the most recent sixty (60) months.
- 2) Attachment C (VOC Compliance Worksheet) is suitable for this purpose. This form (written or electronic), or an equivalent created by the permittee, must be used to certify compliance with this requirement.

Reporting:

The permittee shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or an exceedance of any of the terms imposed by this permit limit, or any malfunction which causes a deviation from or an exceedance of this permit limit.

EU0030 – Boiler No. 4			
Emission Unit	Description	Manufacturer/Model #	2004 EIQ Reference #
EU0030	10.5 MMBtu/hour Natural Gas Fired Boiler Installed in 1998	William & Davis	EP06

Permit Condition EU0030-001

10 CSR 10-6.070

New Source Performance Regulations

40 CFR Part 60 Subpart Dc

Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Recordkeeping:

The permittee shall keep a record of the amount of natural gas combusted during each day for this emission unit as required by 40 CFR 60.48c(g).

EU0040 – Chromium Electroplating Operation			
Emission Unit	Description	Manufacturer/Model #	2004 EIQ Reference #
EU0040	Decorative Chromium Electroplating Tanks	-	NA

Permit Condition EU0040-001

10 CSR 10-6.080

Emission Standards for Hazardous Air Pollutants

40 CFR Part 63 Subpart N

National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks

The following conditions apply to decorative chromium electroplating tanks using a chromic acid bath located at a minor source of HAPs that uses a composite meshpad/packed bed scrubber system and a wetting agent.

Emission Limitation:

- 1) The emission limitations in §63.342 apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for affected sources subject to this subpart. The emission limitations do not apply during periods of malfunction, but the work practice standards that address operation and maintenance and that are required by paragraph §63.342(f) must be followed during malfunctions. [§63.342(b)(1)]
- 2) During tank operation, each owner or operator of an existing, new, or reconstructed affected source shall control chromium emissions discharged to the atmosphere from that affected source by not allowing the surface tension of the electroplating or anodizing bath contained within the affected source to exceed 45 dynes per centimeter (dynes/cm) (3.1×10^{-3} pound-force per foot [lb_f/ft]) as measured by a stalagmometer or 35 dynes per centimeter (dynes/cm) (2.4×10^{-3} pound-force per foot [lb_f/ft]) as measured by a tensiometer at any time during operation of the tank. [§63.342(d)(2)]
- 3) Compliance with the requirements applicable to chromic acid baths shall not be met by using a reducing agent to change the form of chromium from hexavalent to trivalent. [§63.342(g)]

Work Practice Standards

- 1) The permittee shall comply with the following work practice standards [§63.342(f)]
 - a) At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the operation and maintenance plan required by §63.342(f)(3). [§63.342(f)(1)(i)]
 - b) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan required by §63.342(f)(3). [§63.342(f)(1)(ii)]
 - c) Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards. [§63.342(f)(1)(iii)]
- 2) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the source. [§63.342(f)(2)(i)]
- 3) Based on the results of a determination made under §63.342(f)(2)(i), the Administrator may require that an owner or operator of an affected source make changes to the operation and maintenance plan required by §63.342(f)(3) for that source. Revisions may be required if the Administrator finds that the plan: [§63.342(f)(2)(ii)]
 - a) Does not address a malfunction that has occurred; [§63.342(f)(2)(ii)(A)]

- b) Fails to provide for the operation of the affected source, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or [§63.342(f)(2)(ii)(B)]
- c) Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable. [§63.342(f)(2)(ii)(C)]
- 4) *Operation and maintenance plan.* The owner or operator of an affected source subject to the work practices of §63.342(f) shall prepare an operation and maintenance plan to be implemented no later than the compliance date. The plan shall be incorporated by reference into the source's Title V permit, if and when a Title V permit is required. The plan shall include the following elements: [§63.342(f)(3)(i)]
 - a) The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device (if such a device is used to comply with the emission limits), and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of this equipment; [§63.342(f)(3)(i)(A)]
 - b) For sources using an add-on air pollution control device or monitoring equipment to comply with this subpart, the plan shall incorporate the work practice standards for that device or monitoring equipment, as identified in Table 1 of this regulation, if the specific equipment used is identified in Table 1 of this regulation; [§63.342(f)(3)(i)(B)]
 - c) If the specific equipment used is not identified in Table 1 of §63.342, the plan shall incorporate proposed work practice standards. These proposed work practice standards shall be submitted to the Administrator for approval as part of the submittal required under §63.343(d); [§63.342(f)(3)(i)(C)]
 - d) The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur; and [§63.342(f)(3)(i)(D)]
 - e) The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions. [§63.342(f)(3)(i)(E)]
- 5) If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the operation and maintenance plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunction events, and a program for corrective action for such events. [§63.342(f)(3)(ii)]
- 6) If actions taken by the owner or operator during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan required by §63.342(f)(3)(i), the owner or operator shall record the actions taken for that event and shall report by phone such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the owner or operator makes alternative reporting arrangements, in advance, with the Administrator. [§63.342(f)(3)(iv)]
- 7) The owner or operator shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Administrator for the life of the affected source or until the source is no longer subject to the provisions of this subpart. In addition, if the operation and maintenance plan is revised, the owner or operator shall keep previous (i.e., superseded) versions of the operation and maintenance plan on record to be made available for inspection, upon request, by the Administrator for a period of 5 years after each revision to the plan. [§63.342(f)(3)(v)]
- 8) To satisfy the requirements of §63.342(f)(3), the owner or operator may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans, provided the alternative plans meet the requirements of §63.342. [§63.342(f)(3)(vi)]

Monitoring and Testing Requirements:

- 1) *Performance test requirements.* Performance tests shall be conducted using the test methods and procedures in §63.344 and §63.7. Performance test results shall be documented in complete test reports that contain the information required by §63.344(a)(1) through (a)(9). The test plan to be followed shall be made available to the Administrator prior to the testing, if requested. [§63.344(a)]

- a) A brief process description; [§63.344(a)(1)]
 - b) Sampling location description(s); [§63.344(a)(2)]
 - c) A description of sampling and analytical procedures and any modifications to standard procedures; [§63.344(a)(3)]
 - d) Test results; [§63.344(a)(4)]
 - e) Quality assurance procedures and results; [§63.344(a)(5)]
 - f) Records of operating conditions during the test, preparation of standards, and calibration procedures; [§63.344(a)(6)]
 - g) Raw data sheets for field sampling and field and laboratory analyses; [§63.344(a)(7)]
 - h) Documentation of calculations; [§63.344(a)(8)]
 - i) Any other information required by the test method. [§63.344(a)(9)]
- 2) *Establishing site-specific operating parameter values.* All monitoring equipment shall be installed such that representative measurements of emissions or process parameters from the affected source are obtained. For monitoring equipment purchased from a vendor, verification of the operational status of the monitoring equipment shall include execution of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system. [§63.344(d)(2)]
- a) Specifications for differential pressure measurement devices used to measure velocity pressure shall be in accordance with section 2.2 of Method 2 (40 CFR part 60, appendix A). [§63.344(d)(2)(i)]
 - b) Specification for differential pressure measurement devices used to measure pressure drop across a control system shall be in accordance with manufacturer's accuracy specifications. [§63.344(d)(2)(ii)]
- 3) *Monitoring to demonstrate continuous compliance.* The owner or operator of an affected source subject to the emission limitations of this subpart shall conduct monitoring according to the type of air pollution control technique that is used to comply with the emission limitation. The monitoring required to demonstrate continuous compliance with the emission limitations is identified in §63.343 for the air pollution control techniques expected to be used by the owners or operators of affected sources. [§63.343(c)]
- 4) During the initial performance test, the owner or operator of an affected source, or a group of affected sources under common control, complying with the emission limitations in §63.342 through the use of a composite mesh-pad system shall determine the outlet chromium concentration using the test methods and procedures in §63.344(c), and shall establish as a site-specific operating parameter the pressure drop across the system, setting the value that corresponds to compliance with the applicable emission limitation, using the procedures in §63.344(d)(5). An owner or operator may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliant value the average pressure drop measured over the three test runs of one performance test and accept ± 1 inch of water column from this value as the compliant range. [§63.343(c)(1)(i)]
- 5) On and after the date on which the initial performance test is required to be completed under §63.7, the owner or operator of an affected source, or group of affected sources under common control, shall monitor and record the pressure drop across the composite mesh-pad system once each day that any affected source is operating. To be in compliance with the standards, the composite mesh-pad system shall be operated within ± 1 inch of water column of the pressure drop value established during the initial performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests. [§63.343(c)(1)(ii)]
- 6) The owner or operator of a source required to measure the pressure drop across the add-on air pollution control device in accordance with §63.343(c)(1) through (4) may establish the pressure drop in accordance with the following guidelines: [§63.344(d)(5)]
- a) Pressure taps shall be installed at any of the following locations: [§63.344(d)(5)(i)]
 - i) At the inlet and outlet of the control system. The inlet tap should be installed in the ductwork just prior to the control device and the corresponding outlet pressure tap should be installed on the outlet side of the control device prior to the blower or on the downstream side of the blower; (§63.344(d)(5)(i)(A))
 - ii) On each side of the packed bed within the control system or on each side of each mesh pad within the control system; or [§63.344(d)(5)(i)(B)]

- iii) On the front side of the first mesh pad and back side of the last mesh pad within the control system.
[§63.344(d)(5)(i)(C)]
 - b) Pressure taps shall be sited at locations that are: [§63.344(d)(5)(ii)]
 - i) Free from pluggage as possible and away from any flow disturbances such as cyclonic demisters.
[§63.344(d)(5)(ii)(A)]
 - ii) Situated such that no air infiltration at measurement site will occur that could bias the measurement.
[§63.344(d)(5)(ii)(B)]
 - c) Pressure taps shall be constructed of either polyethylene, polybutylene, or other nonreactive materials.
[§63.344(d)(5)(iii)]
 - d) Nonreactive plastic tubing shall be used to connect the pressure taps to the device used to measure pressure drop. [§63.344(d)(5)(iv)]
 - e) Any of the following pressure gauges can be used to monitor pressure drop: a magnehelic gauge, an inclined manometer, or a "U" tube manometer. [§63.344(d)(5)(v)]
 - f) Prior to connecting any pressure lines to the pressure gauge(s), each gauge should be zeroed. No calibration of the pressure gauges is required. [§63.344(d)(5)(vi)]
- 7) During the initial performance test, the owner or operator of an affected source complying with the emission limitations in §63.342 through the use of a wetting agent in the electroplating bath shall determine the outlet chromium concentration using the procedures in §63.344(c). The owner or operator shall establish as the site-specific operating parameter the surface tension of the bath using Method 306B, appendix A of this part, setting the maximum value that corresponds to compliance with the applicable emission limitation. In lieu of establishing the maximum surface tension during the performance test, the owner or operator may accept 45 dynes/cm as the maximum surface tension value that corresponds to compliance with the applicable emission limitation. However, the owner or operator is exempt from conducting a performance test only if the criteria of §63.343(b)(2) are met. [§63.343(c)(5)(i)]
- 8) The owner or operator of an affected source shall monitor the surface tension of the electroplating bath. Operation of the affected source at a surface tension greater than the value established during the performance test, or greater than 45 dynes/cm (as measured by a stalagmometer) or 35 dynes/cm (as measured by a tensiometer) if the owner or operator is using this value in accordance with §63.343(c)(5)(i), shall constitute noncompliance with the standards. The surface tension shall be monitored according to the following schedule: [§63.343(c)(5)(ii)]
- a) The surface tension shall be measured once every 4 hours during operation of the tank with a stalagmometer or a tensiometer as specified in Method 306B, appendix A of this part.
[§63.343(c)(5)(ii)(A)]
 - b) The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every 4 hours of tank operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 8 hours of tank operation. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. The minimum frequency of monitoring allowed by this subpart is once every 40 hours of tank operation. [§63.343(c)(5)(ii)(B)]
 - c) Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every 4 hours must be resumed. A subsequent decrease in frequency shall follow the schedule laid out in §63.343(c)(5)(ii)(B). For example, if an owner or operator had been monitoring an affected source once every 40 hours and an exceedance occurs, subsequent monitoring would take place once every 4 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation, monitoring can occur once every 8 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation on this schedule, monitoring can occur once every 40 hours of tank operation.
[§63.343(c)(5)(ii)(C)]
- 9) Once a bath solution is drained from the affected tank and a new solution added, the original monitoring schedule of once every 4 hours must be resumed, with a decrease in monitoring frequency allowed following the procedures of §63.343(c)(5)(ii) (B) and (C). [§63.343(c)(5)(iii)]

- 10) The surface tension of electroplating baths shall be measured using Method 306B, "Surface Tension Measurement and Recordkeeping for Tanks used at Decorative Chromium Electroplating and Anodizing Facilities," appendix A of this part. This method should also be followed when wetting agent type or combination wetting agent/foam blanket type fume suppressants are used to control chromium emissions from a hard chromium electroplating tank and surface tension measurement is conducted to demonstrate continuous compliance. [§63.344(d)(3)]
- 11) The following work practice standards have been obtained from Table 1 to §63.342

Composite Mesh-pad System and combination of Composite Mesh-pad/Packed-bed Scrubber System

- a) At least once per quarter, visually inspect device to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.
- b) At least once per quarter visually inspect back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.
- c) At least once per quarter visually inspect ductwork from tank to the control device to ensure there are no leaks.
- d) Perform wash down of the composite mesh pads in accordance with manufacturer's recommendations.

Packed-bed Scrubber

- a) At least once per quarter, visually inspect device to ensure there is proper drainage, no chromic acid buildup on the packed beds, and no evidence of chemical attack on the structural integrity of the device.
- b) At least once per quarter, visually inspect back portion of the chevron blade mist eliminator to ensure that it is dry and there is no breakthrough of chromic acid mist.
- c) At least once per quarter visually inspect ductwork from tank to the control device to ensure there are no leaks.
- d) Add fresh make-up water to the top of the packed bed. If greater than 50 percent of scrubber water is drained, make-up water may be added to the scrubber basin. The applicant should note that for horizontal-flow scrubbers, top is defined as the section of the unit directly above the packing media such that the makeup water would flow perpendicular to the air flow through the packing. For vertical-flow units, the top is defined as the area downstream of the packing material such that the makeup water would flow countercurrent to the air flow through the unit.

Work Practice Standards for Monitoring Equipment

- a) Pitot Tube (Packed Bed Scrubber Only): At least once per quarter, back flush with water, or remove from the duct and rinse with fresh water. Replace in the duct and rotate 180 degrees to ensure that the same zero reading is obtained. Check pitot tube ends for damage and replace the tube if damaged or fatigued.
- b) Stalagmometer: Follow manufacturer's recommendations.
- c) Magnahelic: Check calibration against slack tube manometer or similar water filled device.

Recordkeeping:

- 1) All records shall be maintained for a period of 5 years in accordance with §63.10(b)(1). [§63.346(c)]
- 2) The owner or operator of an affected source subject to the provisions of this subpart shall maintain the following records for such source: [§63.346(b)]
 - a) Inspection records for the add-on air pollution control device, if such a device is used, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of §63.342(f) and Table 1 of §63.342 have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection. [§63.346(b)(1)]
 - b) Records of all maintenance performed on the affected source, the add-on air pollution control device, and monitoring equipment; [§63.346(b)(2)]
 - c) Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control, and monitoring equipment; [§63.346(b)(3)]
 - d) Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan; [§63.346(b)(4)]

- e) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan required by §63.342(f)(3); [§63.346(b)(5)]
- f) Test reports documenting results of all performance tests; [§63.346(b)(6)]
- g) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance with the special compliance procedures of §63.344(e); [§63.346(b)(7)]
- h) Records of monitoring data required by §63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected; [§63.346(b)(8)]
- i) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control, or monitoring equipment; [§63.346(b)(9)]
- j) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control, or monitoring equipment; [§63.346(b)(10)]
- k) The total process operating time of the affected source during the reporting period; [§63.346(b)(11)]
- l) Any information demonstrating whether a source is meeting the requirements for a waiver of recordkeeping or reporting requirements, if the source has been granted a waiver under §63.10(f); and [§63.346(b)(15)]
- m) All documentation supporting the notifications and reports required by §63.9, §63.10, and §63.347. [§63.346(b)(16)]
- n) For sources using fume suppressants to comply with the standards, records of the date and time that fume suppressants are added to the electroplating bath. [§63.346(b)(13)]

Reporting:

- 1) The owner or operator of each affected source subject to these standards shall fulfill all reporting requirements outlined in §63.347 and in the General Provisions to 40 CFR Part 63, according to the applicability of subpart A as identified in Table 1 of this subpart. These reports shall be made to the Administrator at the appropriate address as identified in §63.13 or to the delegated State authority. [§63.347(a)]
 - a) Reports required by subpart A of this part and §63.347 may be sent by U.S. mail, fax, or by another courier. [§63.347(a)(1)]
 - i) Submittals sent by U.S. mail shall be postmarked on or before the specified date. [§63.347(a)(1)(i)]
 - ii) Submittals sent by other methods shall be received by the Administrator on or before the specified date. [§63.347(a)(1)(ii)]
 - b) If acceptable to both the Administrator and the owner or operator of an affected source, reports may be submitted on electronic media. [§63.347(a)(2)]
- 2) A statement of whether the affected source is located at a major source or an area source as defined in §63.2. [§63.347(c)(1)(ix)]
- 3) *Notification of performance test.* The owner or operator of an affected source shall notify the Administrator in writing of his or her intention to conduct a performance test at least 60 calendar days before the test is scheduled to begin to allow the Administrator to have an observer present during the test. Observation of the performance test by the Administrator is optional. [§63.347(d)(1)]
- 4) In the event the owner or operator is unable to conduct the performance test as scheduled, the provisions of §63.7(b)(2) apply. [§63.347(d)(2)]
- 5) *Notification of compliance status.* (1) A notification of compliance status is required each time that an affected source becomes subject to the requirements of this subpart. [§63.347(e)(1)]
- 6) If the State in which the source is located has not been delegated the authority to implement the rule, each time a notification of compliance status is required under this part, the owner or operator of an affected source shall submit to the Administrator a notification of compliance status, signed by the responsible official (as defined in §63.2) who shall certify its accuracy, attesting to whether the affected source has complied with this subpart. If the State has been delegated the authority, the notification of compliance status shall be submitted to the appropriate authority. The notification shall list for each affected source: [§63.347(e)(2)]

- a) The applicable emission limitation and the methods that were used to determine compliance with this limitation; [§63.347(e)(2)(i)]
 - b) If a performance test is required by this subpart, the test report documenting the results of the performance test, which contains the elements required by §63.344(a), including measurements and calculations to support the special compliance provisions of §63.344(e) if these are being followed; [§63.347(e)(2)(ii)]
 - c) The type and quantity of hazardous air pollutants emitted by the source reported in mg/dscm or mg/hr if the source is using the special provisions of §63.344(e) to comply with the standards. (If the owner or operator is subject to the construction and reconstruction provisions of §63.345 and had previously submitted emission estimates, the owner or operator shall state that this report corrects or verifies the previous estimate.) For sources not required to conduct a performance test in accordance with § 63.343(b), the surface tension measurement may fulfill this requirement; [§63.347(e)(2)(iii)]
 - d) For each monitored parameter for which a compliant value is to be established under §63.343(c), the specific operating parameter value, or range of values, that corresponds to compliance with the applicable emission limit; [§63.347(e)(2)(iv)]
 - e) The methods that will be used to determine continuous compliance, including a description of monitoring and reporting requirements, if methods differ from those identified in this subpart; [§63.347(e)(2)(v)]
 - f) A description of the air pollution control technique for each emission point; [§63.347(e)(2)(vi)]
 - g) A statement that the owner or operator has completed and has on file the operation and maintenance plan as required by the work practice standards in §63.342(f); [§63.347(e)(2)(vii)]
 - h) If the owner or operator is determining facility size based on actual cumulative rectifier capacity in accordance with §63.342(c)(2), records to support that the facility is small. For existing sources, records from any 12-month period preceding the compliance date shall be used or a description of how operations will change to meet a small designation shall be provided. For new sources, records of projected rectifier capacity for the first 12-month period of tank operation shall be used; [§63.347(e)(2)(viii)]
 - i) A statement by the owner or operator of the affected source as to whether the source has complied with the provisions of this subpart. [§63.347(e)(2)(ix)]
- 7) For sources required to conduct a performance test by §63.343(b), the notification of compliance status shall be submitted to the Administrator no later than 90 calendar days following completion of the compliance demonstration required by §63.7 and §63.343(b). [§63.347(e)(3)]
 - 8) For sources that are not required to complete a performance test in accordance with §63.343(b), the notification of compliance status shall be submitted to the Administrator no later than 30 days after the compliance date specified in §63.343(a), except the date on which sources in California shall monitor the surface tension of the anodizing bath is extended to January 25, 1998. [§63.347(e)(4)]
 - 9) *Reports of performance test results.* If the State in which the source is located has not been delegated the authority to implement the rule, the owner or operator of an affected source shall report to the Administrator the results of any performance test conducted as required by §63.7 or §63.343(b). If the State has been delegated the authority, the owner or operator of an affected source should report performance test results to the appropriate authority. [§63.347(f)(1)]
 - 10) Reports of performance test results shall be submitted no later than 90 days following the completion of the performance test, and shall be submitted as part of the notification of compliance status required by §63.347(e). (§63.347(f)(2))
 - 11) **Ongoing compliance status reports for area sources.** The requirements of this paragraph do not alleviate affected area sources from complying with the requirements of State or Federal operating permit programs under 40 CFR part 71. (§63.347(h))
 - a) The owner or operator of an affected source that is located at an area source site shall prepare a summary report to document the ongoing compliance status of the affected source. The report shall contain the information identified in §63.347(g)(3), shall be completed annually and retained on site, and made available to the Administrator upon request. The report shall be completed annually except as provided in §63.347(h)(2). [§63.347(h)(1)]
 - i) *Reports of exceedances.* If both of the following conditions are met, semiannual reports shall be prepared and submitted to the Administrator: [§63.347(h)(2)(i)]

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- (1) The total duration of excess emissions (as indicated by the monitoring data collected by the owner or operator of the affected source in accordance with §63.343(c)) is 1 percent or greater of the total operating time for the reporting period; and [§63.347(h)(2)(i)(A)]
 - (2) The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is 5 percent or greater of the total operating time. [§63.347(h)(2)(i)(B)]
 - ii) Once an owner or operator of an affected source reports an exceedance as defined in §63.347(h)(2)(i), ongoing compliance status reports shall be submitted semiannually until a request to reduce reporting frequency under §63.347(h)(3) is approved. [§63.347(h)(2)(ii)]
 - iii) The Administrator may determine on a case-by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the source. [§63.347(h)(2)(iii)]
- 12) ***Request to reduce frequency of ongoing compliance status reports for area sources.*** An owner or operator who is required to submit ongoing compliance status reports on a semiannual (or more frequent) basis, or is required to submit its annual report instead of retaining it on site, may reduce the frequency of reporting to annual and/or be allowed to maintain the annual report onsite if all of the following conditions are met: [§63.347(h)(3)(i)]
- a) For 1 full year (e.g., 2 semiannual or 4 quarterly reporting periods), the ongoing compliance status reports demonstrate that the affected source is in compliance with the relevant emission limit; [§63.347(h)(3)(i)(A)]
 - b) The owner or operator continues to comply with all applicable recordkeeping and monitoring requirements of subpart A of this part and this subpart; and [§63.347(h)(3)(i)(B)]
 - c) The Administrator does not object to a reduced reporting frequency for the affected source, as provided in §63.347(h)(3)(ii) and (iii). [§63.347(h)(3)(i)(C)]
- 13) The frequency of submitting ongoing compliance status reports may be reduced only after the owner or operator notifies the Administrator in writing of his or her intention to make such a change, and the Administrator does not object to the intended change. In deciding whether to approve a reduced reporting frequency, the Administrator may review information concerning the source's previous performance history during the 5-year recordkeeping period prior to the intended change, or the recordkeeping period since the source's compliance date, whichever is shorter. Records subject to review may include performance test results, monitoring data, and evaluations of an owner or operator's conformance with emission limitations and work practice standards. Such information may be used by the Administrator to make a judgement about the source's potential for noncompliance in the future. If the Administrator disapproves the owner or operator's request to reduce reporting frequency, the Administrator will notify the owner or operator in writing within 45 days after receiving notice of the owner or operator's intention. The notification from the Administrator to the owner or operator will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted. [§63.347(h)(3)(ii)]
- 14) As soon as the monitoring data required by §63.343(c) show that the source is not in compliance with the relevant emission limit, the frequency of reporting shall revert to semiannual, and the owner shall state this exceedance in the ongoing compliance status report for the next reporting period. After demonstrating ongoing compliance with the relevant emission limit for another full year, the owner or operator may again request approval from the Administrator to reduce the reporting frequency as allowed by §63.347(h)(3). [§63.347(h)(3)(iii)]

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065(6)(C)3.B]

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
- 3) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-3.030 Open Burning Restrictions

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
 - a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
 - b) The schedule of burning operations;
 - c) The exact location where open burning will be used to dispose of the trade wastes;
 - d) Reasons why no method other than open burning is feasible; and
 - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt Siegel Robert Automotive - Portageville from the provisions of any other law, ordinance or regulation.
- 5) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

10 CSR 10-3.090 Restriction of Emission of Odors

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

This requirement is not federally enforceable.

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.

- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.

- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
- a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued,

10 CSR 10-6.065(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements

1) Recordkeeping

- a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
- b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.

2) Reporting

- a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
- b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
- c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
- d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(6)(C)1.F Severability Clause

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

10 CSR 10-6.065(6)(C)1.G General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The

permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios

None

10 CSR 10-6.065(6)(C)3 Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, as well as the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;

- d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065(6)(C)6 Permit Shield

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
 - a) The application requirements are included and specifically identified in this permit, or
 - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
 - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
 - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
 - c) The applicable requirements of the acid rain program,
 - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
 - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

10 CSR 10-6.065(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(6)(C)8 Operational Flexibility

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously

emitted. The permittee shall notify the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

10 CSR 10-6.065(6)(C)9 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
 - d) The permit shield shall not apply to these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Barry DeRousse, Plant Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) MDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the draft permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

Attachment A-1
Highest Individual HAP Emission Tracking Sheet

This form is an example of a form which may be used to record data required by this permit. In order for Siegel Roberts Automotive to demonstrate compliance that it is not subject to the requirements of 40 CFR Part 63, Subpart PPPP, it must demonstrate that the annual emissions of any one individual hazardous air pollutant will not exceed 10 tons in any consecutive 12-month period.

12 Month Rolling Average Recordkeeping Report
Highest Individual HAP Emission by Emission Unit (tons)

Emission Unit	Month												12 Month Rolling Average
	1	2	3	4	5	6	7	8	9	10	11	12	
EU0010													
EU0020													
Other *													
Total													

* Other:- includes HAP emitting sources listed as emission units without limitation

Attachment A-2

Total HAP Emission Tracking Sheet

This form is an example of a form which may be used to record data required by this permit. In order for Siegel Robert Automotive to demonstrate compliance that it is not subject to the requirements of 40 CFR Part 63, Subpart PPPP, it must demonstrate that the annual emissions of any all hazardous air pollutants combined will not exceed 25 tons in any consecutive 12-month period.

12 Month Rolling Average Recordkeeping Report
Total HAPs Emissions by Emission Unit (tons)

Emission Unit	Month												12 Month Rolling Average
	1	2	3	4	5	6	7	8	9	10	11	12	
EU0010													
EU0020													
Other *													
Total													

* Other:- includes HAP emitting sources listed as emission units without limitation

This attachment or an equivalent may be used to help meet the recordkeeping requirements of Permit Condition PW002

[illegible]

Attachment B-2

10 CSR 10-6.220 Compliance Demonstration

This attachment or an equivalent may be used to help meet the recordkeeping requirements of Permit Condition PW002.

Method 22 (Outdoor) Observation Log		
Emission Unit		
Observer	Date	
Sky Conditions		
Precipitation		
Wind Direction	Wind Speed	
Sketch process unit: Indicate the position relative to the source and sun; mark the potential emission points and/or the observing emission points.		
Observation Clock Time	Observation Period Duration (minute:second)	Accumulative Emission Time (minute:second)
Begin Observation		
End Observation		

Attachment B-3

10 CSR 10-6.220 Compliance Demonstration Method 9 Visual Determination of Opacity

This attachment or an equivalent may be used to help meet the recordkeeping requirements of Permit Condition PW002.

Method 9 Opacity Emissions Observations	
Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation?

YES

NO

Signature of Observer

Attachment C

[illegible]

* List each paint, coating, dilution solvent, resin, varnish, finishing product or solvent with HAPs used as a separate entry in table.

**** Column C = Column A x Column B/2000**

*** Monthly Sum of values in Column C

**** Rolling 12 month sum in Column D

STATEMENT OF BASIS

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Part 70 Operating Permit Renewal Application, received January 27, 2005;
- 2) 2004 Emissions Inventory Questionnaire, received April 4, 2005;
- 3) Part 70 Operating Permit OP2000-018, issued February 28, 2000; and
- 4) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

Title VI – 40 CFR Part 82, *Protection of Stratospheric Ozone*,

This rule has been included in the operating permit in order to provided citing for the use of ozone depleting substances.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-6.400, *Restriction of Emissions of Particulate Matter from Industrial Processes*

This rule does not apply to the plastic grinding and electroplating operations because, based on engineering judgement, the amount of particulate emissions from the grinding and electroplating operations is expected to be less than 0.5 lb/hour threshold for applicability of this rule.

Construction Permit Revisions

The following revisions were made to construction permits for this installation:

None

NSPS Applicability

10 CSR 10-6.070, New Source Performance Regulations

40 CFR Part 60, *Subpart Dc, Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units*

The 10.5 MMBtu/hour natural gas fired boiler is subject to the requirements of this standard.

40 CFR 60 *Subpart K, Ka and Kb*

These regulations do not apply to the diesel storage tanks or other volatile organic storage tanks found at the installation because their capacity is less than that required for the regulations to be applicable. The propane tanks are exempt from Subpart Kb because they are stored under pressure in excess of 204.9 kPa in accordance with 60.110b(d)(2).

MACT Applicability

This permit imposes a plantwide condition for limiting the plantwide HAP emission to less than 10 tons per year of individual HAPs and 25 tons per year of combined HAPs. Therefore, Siegel Roberts is not a major source of HAP emissions. Since Siegel Roberts voluntarily applied for this plantwide restriction and the federally enforceable permit condition will be enforceable via this permit prior to the compliance date (April 19, 2007) for the Plastic Parts Surface Coating MACT codified under 40 CFR Part 63, Subpart PPPP, *National Emission Standards for the Surface Coating of Plastic Parts and Products*, requirements of Subpart PPPP will not be applicable to this installation.

The Chromium MACT, 40 CFR Part 63 Subpart N, *National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks* will continue to be applicable since that standard is applicable to area sources (less than major) of HAPs also. The chromium electroplating operations at the facility are classified as a decorative chromium electroplating facility that uses a chromic acid bath and composite meshpad/packed bed scrubber system and a wetting agent to control emissions and surface tension of the bath, respectively.

Electroplating Process Description: Siegel Roberts injection molds acrylonitrile butadiene styrene (ABS) plastic for the parts that they run through the plater. The process consists of a chromic acid/sulfuric acid dip, followed by several rinses. The parts then go through an activator bath rinsed, and then to an accelerator bath and rinsed. The parts then go through an electroless copper bath, rinsed, through two more copper baths to help build copper, and the parts are rinsed. The parts then go through three nickel baths building nickel, and providing corrosion protection, and rinsed. The final step is a chrome plating bath and the parts are rinsed. The parts go through a drying oven and then to paint shop and then assembled prior to shipment. All rinses from the plating process go to waste treatment where the water is treated and discharged under a NPDES permit.

NESHAP Applicability

40 CFR Part 61 Subpart M, *National Emission Standard for Asbestos*, §61.145(a), Standard for demolition and renovation, applies to the installation.

CAM Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that meets all of the following:

- Be subject to an emission limitation or standard, and
- Use a control device to achieve compliance, and
- Have pre-control emissions that exceed or are equivalent to the major source threshold.

None of the emission units at the installation are subject to 40 CFR Part 64 because the uncontrolled potential emissions are below the major source thresholds for all emission units that have control devices.

Other Regulatory Determinations

- 1) 10 CSR 10-6.400, *Restriction of Emissions of Particulate Matter from Industrial Processes*
The original permit had listed requirements under 10 CSR 10-3.050. This rule has since been replaced by 10 CSR 10-6.400. The original permit had also listed this rule to be applicable to the paint spray booths, grinding operations and nickel/copper plating operations. Based on engineering judgment it has been deemed that little or no particulate emissions are expected from the plating process. Furthermore, the facility has also informed MDNR that the emission from grinding operations are insignificant and below reportable thresholds. Emission units with potential particulate emissions less than 0.5 lb/hour are exempt from the requirements of this regulation. Therefore, this regulation does not apply to the grinding operations and nickel/copper plating operation. This regulation will however apply to the paint booths.

EU0010: For the purpose of determining the maximum allowable particulate matter emissions from EU0010 Coating Operations (Existing Booths), the following calculations were performed.

Maximum Hourly Design Rate = 21 gallons of coating/hour
VOC content of coatings from application for new booths = 80% by weight (approximately)
Coating Density from MSDS = 8.0 pounds/gallon

Process Weight, P (tons/hr)

$$P = 21 \text{ gallons/hour} \times 8 \text{ lb/gallon} \times 1 \text{ ton}/2000 \text{ lbs} \\ = 0.084 \text{ tons/hour}$$

Maximum Allowable Emissions, E (Pounds/hr)

$$E = 4.10 \times (0.08)^{0.67} \\ = 0.75 \text{ pounds/hr}$$

COMPLIANCE DEMONSTRATION

Worst case solid content = 20% by weight

Maximum solid sprayed = 0.084 tons/hour \times 0.2 = 0.0168 tons/hour = 33.6 lb/hour

Transfer Efficiency = 50%

Fabric filter or water curtain avg. efficiency = 97%

Max. achievable emission = $(0.50 \times 33.6 \text{ lbs/hr}) \times (1 - 0.97) = 0.504 \text{ lbs/hr} < 0.75 \text{ lbs/hr}$

EU0020: For the purpose of determining the maximum allowable particulate matter emissions from EU0020 Coating Operations (New Booths), the following calculations were performed.

Maximum Hourly Design Rate = 2.8 gallons of coating/hour

VOC content of coatings from application for new booths = 80% by weight (approximately)

Coating Density from MSDS = 8.0 pounds/gallon

Process Weight, P (tons/hr)

$$P = 2.8 \text{ gallons/hour} \times 8 \text{ lb/gallon} \times 1 \text{ ton}/2000 \text{ lbs} \\ = 0.0112 \text{ tons/hour}$$

Maximum Allowable Emissions, E (Pounds/hr)

$$E = 4.10 \times (0.0112)^{0.67} \\ = 0.20 \text{ lb/hr}$$

COMPLIANCE DEMONSTRATION

Worst case solid content = 20% by weight

Maximum solid sprayed = 0.0112 tons/hour x 0.2 = 0.0022 tons/hour = 4.48 lb/hour

Transfer Efficiency = 50% Fabric filter or water curtain avg. efficiency = 97%

Max. achievable emission = (0.50 x 4.48 lbs/hr) x (1-0.97) = 0.067 lbs/hr < 0.20 lbs/hr

The above calculations show that the emission units' maximum emission rate will be lower than the allowable emission rate. There is a relatively small margin of compliance, and compliance is dependent upon the proper operation of the fabric filters or water curtains at high efficiency. Therefore, inspection and recordkeeping for the fabric filters and water curtains is required and has been included in this permit.

2) 10 CSR 10-3.060, *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating.*

The following indirect heating sources listed in the table below are subject to the requirements of this rule. However, the APCP does not consider these units to be capable of exceeding the particulate matter (PM) emission limitation (0.24 pounds of particulate matter per million BTU's of heat input) of this rule.

Q (installation) was calculated as follows.

<u>Emission Units</u>	<u>Heat Input</u>
Boiler #1	3.36 MMBtu/hr
Boiler #4	10.5 MMBtu/hr
Space heaters	14.5 MMBtu/hr
Ovens	6 MMBtu/hr
Air Heaters	7 MMBtu/hr
Boiler #3	0.992 MMBtu/hr
Total Q	42.35 MMBtu/hr

$$\text{Emission Rate} = 0.90 (Q)^{-0.174} = 0.90 \times (42.35)^{-0.174} = 0.47 \text{ lb/MMBtu}$$

Conservatively assuming 1050 Btu per standard cubic foot of natural gas, 94,000 Btu/gal for propane and using the PM emission factor 7.6 lb/MMscf for natural gas combustion and 0.4 lbs/1000 gal for propane combustion (AP-42, Sections 1.4 and 1.5, July 1998); the potential emission is 0.0072 lb/MMBtu when using natural gas and 0.0032 lb/MMBtu.

Therefore, as shown in the calculations above, these units are always expected to be in compliance with the PM limitation, this rule was not included in the applicable requirements section of this operating permit.

3) 10 CSR 10-6.100, *Alternate Emission Limits*

This rule is not applicable since the facility is not located in an ozone non-attainment area.

4) 10 CST 10-6.220, *Restriction of Visible Air Contaminants*

The original permit listed the rule as applicable to each emission unit. This rule is applicable to the facility and has been listed as a plantwide condition.

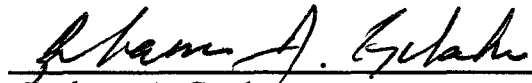
Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

- 1) The specific pollutant regulated by that rule is not emitted by the installation;
- 2) The installation is not in the source category regulated by that rule;
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule;
- 4) The installation does not contain the type of emission unit which is regulated by that rule;
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the APCP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Prepared by:



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